

RID (Rule Interpretation Decision)

(Use additional sheets as necessary)

Type of RID		Requested Response Time	DSD Assigned RID # 79
Customer RID	<input type="checkbox"/>	24 hours	<input type="checkbox"/>
Internal Staff RID	<input checked="" type="checkbox"/>	5 working days	<input type="checkbox"/>
		As time available	<input checked="" type="checkbox"/>

1. Project Name: Addition of Parking Standards for Skilled Nursing Facilities

2. Project Number: None

(Plat #, Zoning Case #, etc.)

3. Project Street Address: None

(If not available nearest intersection of two public streets)

4. Applicant Name: Planning and Development Service Staff, Plans & Permits

5. Applicant Address: 1901 S. Alamo

6. Applicant Telephone #: (210) 207-8281

7. Applicant e-mail Address: NA

8. Rule in Question:

Requirement for minimum and maximum parking for Assisted Living or Elderly Home in Table 526-3a Parking in Residential Use Districts, or Table 526-3b Parking in Non-Residential Use Districts, when a skilled nursing facility is being proposed.

9. Applicant's Position: NA

(Including date position presented and name of city staff point of contact)

Date: **Contact:** **Contact Telephone #:**

10. Staff Finding:

(Including date of finding and name of city staff person formulating finding)

Date: 02/17/2009 **Contact:** Richard Chamberlin **Contact Telephone #:** (210) 207-8281

Table 311-1 (Residential Use Matrix), lists the districts that can accommodate Assisted Living Facilities, Assisted Living or Elderly Home, and Skilled Nursing Facilities, while Table 311-2 (Non-Residential Use Matrix), lists the districts that can accommodate Service-Assisted Living Facilities, and Service-Skilled Nursing Facility.

Section 35-526 Parking and Loading Standards lists the minimum and maximum parking for the following uses: Table 526-3a (Parking in Residential Use Districts) – Assisted Living with a minimum of 0.3 parking spaces per room, and a maximum of 1 parking space per room. There are no parking standards listed in Table 526-3b (Parking in Non-Residential Use Districts) for any of the uses listed in Table 311-2.

Appendix A of the UDC defines “Assisted Living Facilities”, “Skilled Nursing Facilities”, but not “Assisted Living Facilities or Elderly Homes”. Skilled Nursing Facilities are defined as “long term care”, and further defined by patients not entering the facility by choice.

As the length of hospital stays have decreased, facilities that provide transition between hospital stay and home care have increased. These facilities are typically short term rather than long term, and are by choice rather than non-choice as defined in the UDC Appendix A. These short term care facilities have larger staff, and the patients have many more visitors than would patients in a long-term care facility. PDSD Staff therefore initially uses the parking standards in Table 526-3a (Parking in Residential Use Districts) for all types of facilities that have nursing care, (since this is the only standard listed by the UDC, regardless of whether the facility is in a residential district or a non-residential district). Once the review comment has been received by the developer, staff has worked with applicants to provide some level of parking between that of a high intensive parking requirement for hospital and low required parking for Assisted Living (elderly home).

11. Staff Position:

(Including date position presented internally and name of city staff person formulating position)

Date: 02/17/2009 **Contact:** Richard Chamberlin **Contact Telephone #:** (210) 207-8281

Staff finds that it is appropriate to provide for increased minimum and maximum parking spaces for a short term care skilled nursing facility. While some of the skilled nursing facilities are designed with one bed per room, others are designed with two beds per room, and with more visitors and staff, more parking is required than that allowed for an assisted living/elderly home.

Since these are short term care facilities, although allowed in a residential district per Table 311-2, the function of the facility and heavier parking requirements are more appropriate for a non-residential district. Therefore PDSD staff proposes the addition of a minimum and maximum parking standard for skilled nursing facilities under Table 526-3b Parking in Non-Residential Use Districts.

12. Departmental Policy or Action:

(Including date of presentation of policy or action to the applicant, the effective date of the policy or action, schedule for pursuing an amendment to the code if required and signature of the Director of Development Services)

Date of policy/action: 02/17/2009 Effective Date of policy/action: 02/17/2009

The Director finds that the following policy and UDC interpretation is valid and to be followed by Planning and Development Services staff.

Table 526-3b shall include a new use specifying parking requirements:

Classification	Permitted Use	Minimum Vehicle Spaces	Maximum Vehicle Spaces
SERVI CE	MEDICAL – skilled nursing facilities	0.3 per bed	1 per bed

Staff is directed to utilize this minimum and maximum required parking for all short term nursing care facilities that function as a transition between a hospital and home care. Staff is directed to proceed with a UDC amendment in the next amendment cycle.

Staff is directed to further define a short-term skilled nursing facility in Appendix A for the next UDC amendment cycle. Staff is further directed to review the use matrix tables, Table 311-1 and 311-2 as to where long term/short term skilled nursing facilities are appropriate, and in regards to parking requirements under Table 526-3a and 526-3b.



Roderick Sanchez, AICP, C.B.O.
Director Development Services Department